

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

OPENEVIDENCE, INC.,

Plaintiff,

-against-

PATHWAY MEDICAL, INC., LOUIS MULLIE,
JONATHAN HERSHON ST-JEAN,
HOVHANNES KARAPETYAN, ERIC
YAMGA, KHUDHUR MOHAMMED, and
VINCE ROY,

Defendants.

Case No.: 1:25-cv-10471-MJJ

**MOTION FOR A 60-DAY
EXTENSION FOR DEFENDANTS
PATHWAY MEDICAL INC., AND
LOUIS MULLIE TO RESPOND TO
THE FIRST AMENDED COMPLAINT**

Pursuant to Fed. R. Civ. P. 6(b), Defendants PATHWAY MEDICAL, INC., and LOUIS MULLIE, M.D., s/h/a LOUIS MULLIE (“Defendants”), by their undersigned attorney, hereby move for an Order extending by 60 days the Defendants’ time to answer/move with respect to the First Amended Complaint. If this motion is granted, the amended deadline for Defendants to respond to the First Amended Complaint will be October 28, 2025. Defendants submit the following in support of this motion:

1. On August 15, 2025, Plaintiffs filed the First Amended Complaint. The 54-page First Amended Complaint pleads three new causes of action and adds five Defendants.
2. The time for Defendants to respond to the First Amended Complaint has not yet expired. Defendants’ response is currently due on August 29, 2025. See Fed. R. Civ. P. 15(a)(3).
3. This motion is not being made for purposes of delay. It is based upon current assignments, the press of pending business, and the need to ensure reasonable diligence in preparing an answer or in moving against the First Amended Complaint.
4. Counsel for Plaintiff do not oppose this motion.


WHEREFORE, for the foregoing reasons, Defendants respectfully request that this Court issue an Order extending the time for Defendants to file a response to the First Amended Complaint up to and including October 28, 2025.

A proposed order is attached.

Dated: Valhalla, New York
August 28, 2025

Respectfully submitted,

KAUFMAN BORGEEST & RYAN LLP

By:  _____
Lisa Fleischmann, Esq. (*pro hac vice*)

Attorneys for Defendants

**PATHWAY MEDICAL, INC., AND LOUIS
MULLIE, M.D. s/h/a LOUIS MULLIE**

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LOCAL RULE 7.1(a)(2) CERTIFICATE

I hereby certify that counsel for Defendants Pathways, Inc., and Louis Mullie, M.D., s/h/a Louis Mullie communicated with Plaintiff's counsel, Stacylyn M. Doore, Stephen Broome, and Vanessa Rodriguez on August 27, 2025, to provide notice of Defendants' intent to file this motion and to ascertain Plaintiff's position on the motion. Plaintiff does not oppose this request.

s/ Lisa Fleischmann
Lisa Fleischmann

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CERTIFICATE OF SERVICE
PURSUANT TO LOCAL RULE 5.2

I, Lisa Fleischmann, affirm that on August 28, 2025, I served the above-attached Motion for a 60-day Extension to respond to the First Amended Complaint on the following counsel, Plaintiff's Attorneys of Record, via this Court's CM/ECF filing system:

Stacylyn M. Doore, Esq.
Ryan P. Gorman, Esq.
Vanessa Rodriguez, Esq.
Zi Chun Wang, Esq.
Stephen Broome, Esq.
Nathan Hamstra, Esq.

Dated: Valhalla, New York
August 28, 2025



Lisa Fleischmann, Esq.

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ORDER

The Court, having reviewed the Motion for an Extension of Time for Defendants to Respond to the Plaintiff's First Amended Complaint, and being duly advised, hereby **GRANTS** the motion. Defendants' Response to the First Amended Complaint is due by October 28, 2025.

SO ORDERED.

Date _

UNITED STATES DISTRICT JUDGE